

## **REMARKS**

Claims 1-28 are pending.

Claims 1-28 stand rejected.

## **Information Disclosure Statement**

On August 21, 2006, Applicant resubmitted the references previously submitted on December 15, 2005 in an Information Disclosure Statement that included a PTO 1449 form that correctly referenced the present application.

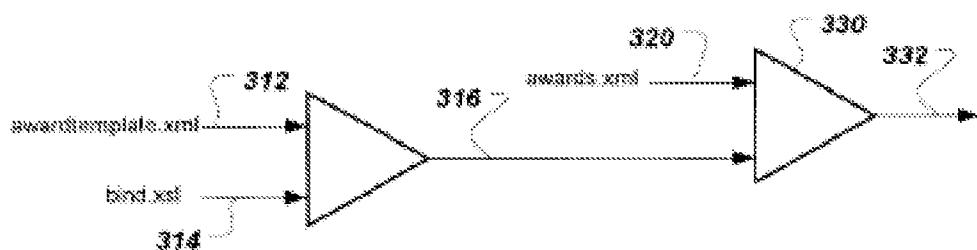
## **Claim Rejections - 35 U.S.C. § 102**

Claims 1-28 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,772,395 issued to Hyman (referred to herein as “*Hyman*”). Applicant respectfully traverses the rejection.

*Hyman* relates to a “self-modifying data flow architecture for computer-readable structures, such as markup language, modeled as a network of interconnected processing elements, each having a data input and a transformation input.” *Hyman*, Abstract. More specifically, *Hyman* teaches that “[n]esting of processing elements within [an] input tree provides for the use of an output tree of one processing element as an input to another processing element.” *Id.*, col. 3, lines 33-35. Thus, *Hyman* teaches the nesting of processes and using a resultant process as an input to another process.

Applicant has reproduced Figures 3A, 3B, 4A, and 4B of *Hyman* to assist in illustrating distinctions between the teachings and suggestions of *Hyman* and the Present Invention.

**Figure 3A**



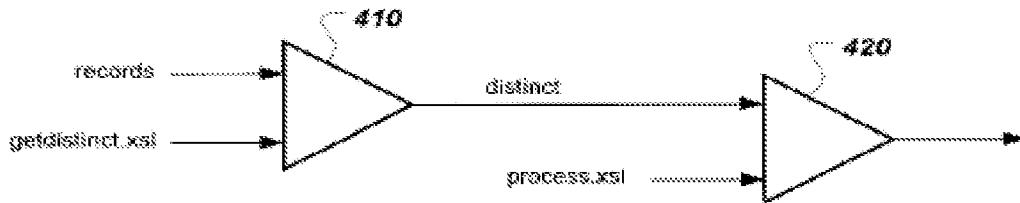
**Figure 3B**

```

<x:xe xmlns:x:xe="noprobs">
  <html>
    <x:xe:widget>
      <x:xe:data>
        <x:xe:widget>
          <x:xe:data>
            <x:xe:records>
              <x:xe:record>
                <x:xe:values>
                  <x:xe:value>apples</x:xe:value>
                  <x:xe:value>bananas</x:xe:value>
                </x:xe:values>
              </x:xe:record>
              <x:xe:record>
                <x:xe:values>
                  <x:xe:value>apples</x:xe:value>
                  <x:xe:value>oranges</x:xe:value>
                </x:xe:values>
              </x:xe:record>
            </x:xe:records>
          </x:xe:data>
          <x:xe:transform src="getdistinct.xsl"/>
        </x:xe:widget>
      </x:xe:data>
      <x:xe:transform src="process.xsl"/>
    </x:xe:widget>
  </html>
</x:xe:>

```

**Figure 4A**



**Figure 4B**

In straightforward terms, *Hyman* teaches nested transforming a first document (312) using a first transformation file (314) into a second transformation file (316). *Hyman*, Figures 3A and 3B, col. 3, line 20 – col. 4, line 14 and col. 8, lines 13-36 (note, Applicant believes that “316” in col. 8, line 27 should be “314”). *Hyman* further teaches that the second transformation file (316) can be used as an input to transform a second document (320) to produce a second output (332) (which is not specifically referenced in the specification). *Id.* Likewise, Figures 4A and 4B teach the nesting of processes with one output used as the input to only one process.

## Present Application.

Applicants respectfully submit that the present invention is neither taught nor suggested by *Hyman*. As background, Applicants refer the Examiner to the following figure. The following figure represents a process flow disclosed in the present application and depicted using the symbology of *Hyman*.

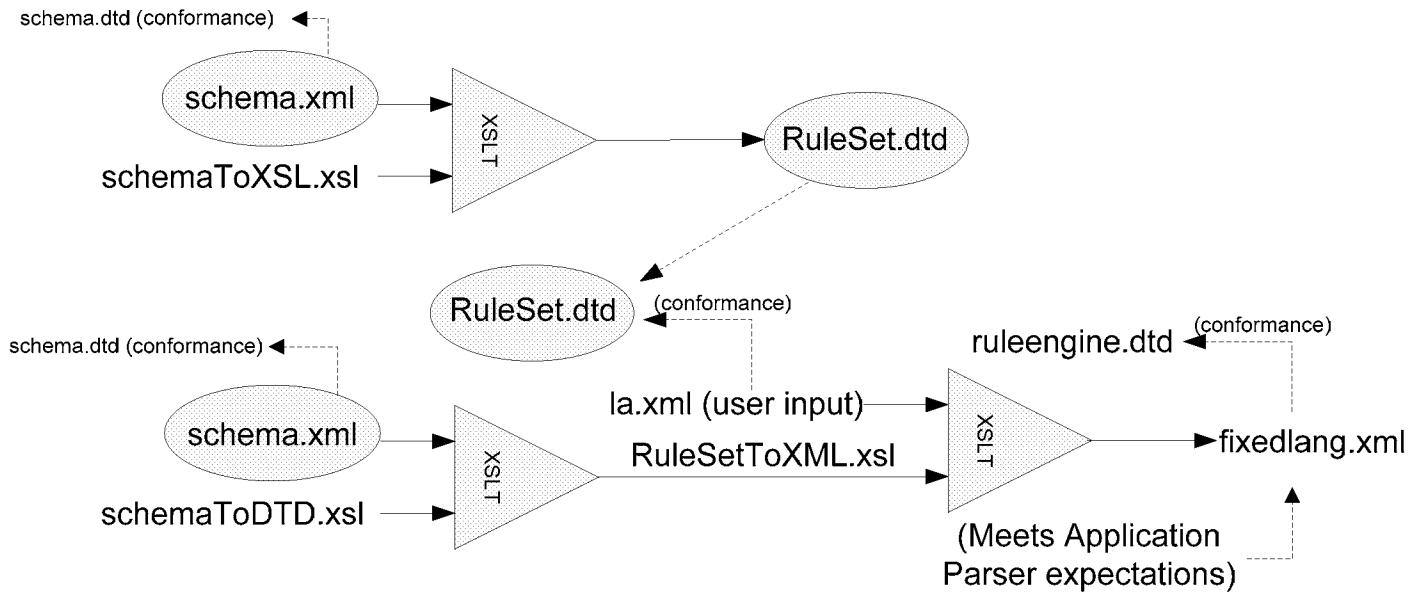


Figure: Present Application Process Flow Embodiment

From the Present Application Process Flow Embodiment Figure, several distinctions from the teachings of *Hyman* can be seen, such as:

First, schema.xml is transformed twice, once to derive the document type definition RuleSet.dtd and again to derive the style sheet RuleSetToXML.xsl.

Second, the derived RuleSet.dtd is a set of rules for interpreting schema.xml. The intermediary outputs of each process in *Hyman* are documents that are further processed to further refine the intermediary output document.

Third, the first derived output RuleSet.dtd is not the ‘input’ (e.g. document being transformed) to the XSLT process, RuleSet.dtd provides the rules to which the input document la.xml should conform. Each intermediary output document in *Hyman* is a

direct input to a subsequent process rather than a set of rules to be applied to a subsequent “input”.

(Note, the invention is defined by the claims and not by specific embodiments described in the Present Application).

Applicants respectfully submit that the claims also distinguish over the teachings and suggestions of *Hyman*.

**Claim 1.**

Applicants respectfully submit that *Hyman* neither teaches nor suggests:

receiving a framework for a first grammar level;

performing a first transformation of said framework to generate a first set of rules relating to interpretation of said first grammar level, wherein the first set of rules are based on a schema of the framework defined for the first grammar level;

performing a second transformation of said framework to generate a first presentation style for said first grammar level;

The Examiner states that “*Hyman* discloses a first set of rules relating to interpretation of said first grammar level (transformation in conjunction with the schemas is inherently involved with the transformation described in col. 3, lines 20-35).” Office Action, p. 6. However, in contrast to *Hyman*, claim 1 is not simply stating that a set of rules is involved in a transformation. Claim 1 recites “**performing a first transformation of said framework to generate a first set of rules relating to interpretation of said first grammar level, wherein the first set of rules are based on a schema of the framework defined for the first grammar level.**” Thus, claim 1 recites that the first set of rules are specifically generated by “performing a first transformation of said network.” *Hyman* does not disclose the origin of the first set of “rules” (getdistinct.xsl). Thus, Applicants respectfully submit that *Hyman* fails to teach or suggest all the limitations of the second element of claim 1.

Additionally, the Examiner states that “Figure 4B shows a second transformation of the framework to generate a fist presentation style for the grammar level.” Office Action, p. 7.

However, referring to Fig. 4B, Applicants respectfully submit that *Hyman* does not teach the “second” transformation of “**the** framework.” Claim 1 recites “performing a first transformation of said framework” and “performing a second transformation of said framework.” In Fig. 4B of *Hyman*, processing element 410 first transforms “records” and processing element 420 then transforms “distinct”. Even assuming for *arguendo* that the document “records” is a “framework”, the documents “records” and “distinct” are distinctive and, thus, not the **same** “framework”. The Examiner states that “[t]his **output** (distinct) then has a second transformation applied (process.xsl) to generate a presentation tree.” Office Action, p. 7. Thus, *Hyman* cannot be teaching or suggesting “performing a first transformation of **said framework**” and “performing a second transformation of **said framework**” as required by Claim 1.

Furthermore, claim 1 recites “performing a second transformation of said framework to generate a first presentation style for said first grammar level.” In claim 1, the “first presentation style” is applied in the method in conjunction with the first set of rules to generate an output in a second grammar. The Examiner identified the “presentation tree” of Figure 4D as the “first presentation style.” However, Applicants respectfully submit that the “presentation tree” of Figure 4D is not the same as the “first presentation style” of claim 1 because, for example, the “presentation tree” cannot be “applied” to a user defined input as required by claim 1. *Hyman* teaches that the “presentation tree” is an **output** and does not teach any application of the presentation tree as required by claim 1.

Also, claim 1 recites “obtaining a user defined input in said first grammar, said user defined input conforming to said first set of rules and said framework.” Thus, the user defined input conforms to the “first set of rules” and the “first set of rules” is generated by “performing a first transformation of said framework to generate [said] first set of rules.” Claim 1. Applicants respectfully submit that *Hyman* fails to teach or suggest that the set of rules (getdistinct.xsl) used in the first transformation of *Hyman* is a set of rules generated by “performing a first transformation of said framework.”

Additionally, Applicants respectfully submit that *Hyman* fails to teach or suggest bringing a process together for “applying said first set of rules [generated by “performing a first transformation of said framework”] and said first presentation style [generated by “performing a

second transformation of said framework”] to said user defined input to generate an output in a second grammar conforming to document rules of an application parser.” Claim 1.

**Claim 8.**

In accordance with the foregoing remarks, Applicant respectfully submits that *Hyman* also fails to teach or suggest the invention of claim 8, which recites:

a computer readable medium having a computer readable product comprising a computer readable document embodied therein, said computer readable document utilized for input into a rule engine, said computer readable document created by performing a method comprising:

receiving a framework for a first grammar level;

performing a first transformation of said framework to generate a first set of rules relating to interpretation of said first grammar level, wherein the first set of rules are based on a schema of the framework defined for the first grammar level;

performing a second transformation of said framework to generate a first presentation style for said first grammar level;

obtaining a user defined input in said first grammar, said user defined input conforming to said first set of rules and said framework; and

applying said first set of rules and said first presentation style to said user defined input to generate an output in said document, said output conforming to a second grammar level conforming to document rules of an application parser.

**Claim 15.**

Applicants respectfully submit that the present invention of claim 15 is allowable for at least the same reasons as independent claim 1. In contrast to the teachings and suggestions of *Hyman*, claim 15 recites:

a computer readable medium having computer program code for extensibly simplifying input provided to a computer program embodied therein, said computer program code configured to cause a computer to:

receive a framework for a first grammar level, wherein said framework comprises a schema;

perform a first transformation of said framework to generate a first set of rules relating to interpretation of said first grammar level, wherein the first set of rules are based on a schema of the framework defined for the first grammar level;

perform a second transformation of said framework to generate a first presentation style for said first grammar level;

obtain a user defined input in said first grammar, said user defined input conforming to said first set of rules and said framework; and

apply said first set of rules and said first presentation style to said user defined input to generate an output in said document, said output conforming to a second grammar level conforming to document rules of an application parser.

### **Claim 22.**

In accordance with the foregoing remarks, Applicant respectfully submits that *Hyman* also fails to teach or suggest the invention of claim 22, which recites:

receiving a schema for a first grammar level;

performing a first transformation of **said schema** to generate a first set of rules relating to interpretation of said first grammar level;

performing a second transformation of **said schema** to generate a first presentation style for said first grammar level;

obtaining a user defined input in said first grammar level, said user defined input conforming to said first set of rules and said schema; and

applying said first set of rules and said first presentation style to said user defined input to generate an output in a second grammar conforming to document rules of an application parser.

**Claim 29 (New).**

Applicant also respectfully submits that *Hyman* also fails to teach or suggest the invention of new claim 29, which recites:

receiving a schema for a first extensible markup language (“XML”) grammar level, wherein the schema conforms to a first document type definition (“DTD”); performing a first transformation of said schema in accordance with a first stylesheet to generate from said schema a second DTD relating to interpretation of said first grammar level; performing a second transformation of said schema in accordance with a second stylesheet to generate a third stylesheet for said first grammar level; obtaining a user defined input in said first grammar level, said user defined input conforming to said first DTD and said second DTD; and applying said second DTD and said third stylesheet to said user defined input to generate an output in a second grammar level that conforms to a third DTD used by the parser.

In light of the above remarks, Applicants respectfully submit that independent claims 1, 8, 15, 22, and 29 are allowable over the teachings and suggestions of *Hyman*.

**Dependent Claims.**

Applicants also respectfully submit that the dependent claims are allowable for at least the same reasons as the independent claim upon which each directly or indirectly depends.

Accordingly, Applicants respectfully request withdrawal of the rejection.

## **CONCLUSION**

In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is requested to telephone the undersigned.

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Respectfully submitted,

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